

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 03 CV 12307 RGS

JOSEPH CHRISTOFORO,)
Plaintiff)
VS.)
JULIO LUPO,)
FRANK G. COUSINS, JR.,)
INDIVIDUALLY AND IN)
HIS CAPACITY AS)
ESSEX COUNTY SHERIFF, and)
CERTAIN UNKNOWN)
INDIVIDUALS)
Defendants)

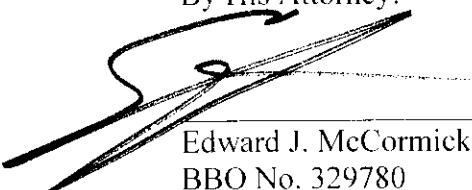
)

JOINT MOTION TO EXTEND TIME
TO CONDUCT DISCOVERY

Now come the parties and respectfully move this Honorable Court to extend the time to complete discovery to February 11, 2005. In support of this motion the parties assign the following:

1. That the parties have engaged in discovery and have been unable to schedule depositions due to scheduling conflicts among counsel;
2. That the parties have been, and continue to discuss a possible resolution of this matter.

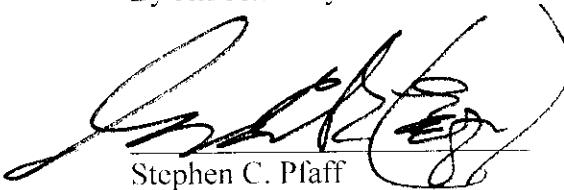
Respectfully Submitted,
JOSEPH CHRISTOFORO,
By His Attorney:



Edward J. McCormick, III
BBO No. 329780
McCormick & Maitland
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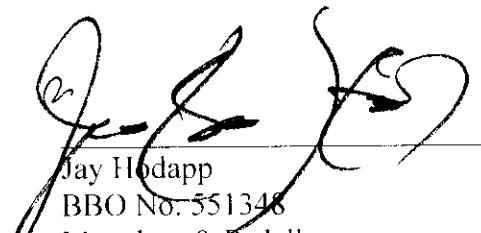
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Respectfully Submitted,
FRANK G. COUSINS, JR.,
By His Attorney:



Stephen C. Pfaff
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Merrick, Louison & Costello, LLP
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Respectfully Submitted,
JULIO LUPO,
By His Attorney:



Jay Hodapp
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CERTIFICATE OF SERVICE

I, Edward J. McCormick, III, certify that on this 22nd day of December, 2004, I have served a true copy of the following, via first class mail, to Stephen C. Pfaff, Esq., Merrick, Louison & Costello, LLP, 67 Batterymarch Street, Boston, MA 02110; and Jay Hodapp, Esq., Monahan & Padellaro, Bullfinch Square, 43 Thorndike Street, Cambridge, MA 02141:

1. Joint Motion to Extend Time to Conduct Discovery.



Edward J. McCormick, III

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